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UNITED STATES OF AMERICA

8 UNITED STATES DISTRICT COURT

9 FOR THE CENTRAL DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 JESSE ALLEN LINDSEY,

14 Defendant.
15

No. CR 2:24-00339-MWF

GOVERNMENT'S **UNOPPOSED** *EX PARTE*
APPLICATION FOR ORDER SEALING
DOCUMENTS; DECLARATION OF LINDSEY
GREER DOTSON

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17 Plaintiff United States of America, by and through its counsel
18 of record, the Acting United States Attorney for the Central District
19 of California and Assistant United States Attorney Lindsey Greer
20 Dotson, hereby applies ex parte for an order that the Declaration of
21 Lindsey Greer Dotson and exhibits referenced therein be filed and/or
22 lodged under seal.

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1 This ex parte application is based upon the attached declaration
2 of Lindsey Greer Dotson.

3 Dated: February 13, 2025

Respectfully submitted,

4 JOSEPH T. MCNALLY
5 Acting United States Attorney

6 /s/ Lindsey Greer Dotson
7 LINDSEY GREER DOTSON
8 Assistant United States Attorney
9 Chief, Criminal Division

10 Attorneys for Plaintiff
11 UNITED STATES OF AMERICA
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DECLARATION OF LINDSEY GREER DOTSON

I, LINDSEY GREER DOTSON, declare as follows:

1. I am an Assistant United States Attorney. I have knowledge of the facts set forth herein and could and would testify to those facts fully and truthfully if called and sworn as a witness.

2. The government requests leave to file under seal the Declaration of Lindsey Greer Dotson ("Dotson Declaration") and exhibits referenced therein, which the government seeks to file and/or lodge in support of its sentencing position. Those exhibits (Exhibits A through F) consist of the victim impact statement, victim interview report, victim injury photographs, surveillance footage before and during the attack, and defendant's Mirandized jail interview. The exhibits contain personally identifiable information, photographs of the victim and her injuries, medical information and treatment for the victim, sensitive details regarding the impact this incident has had on the victim, and a video of defendant's interview in which he discusses a variety of matters, including at times implicating his PII and medical history as well.

3. On February 13, 2025, defendant's attorney, Elena Sadowsky, informed me that defendant does not oppose the government's request to seal.

4. Should the Court deny this application, the government requests that the Dotson Declaration and Exhibits A through F be returned to the government, without filing of the documents on the clerk's public docket.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that

1 this declaration is executed at Los Angeles, California, on February
2 13, 2025.

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LINDSEY GREER DOTSON